

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRACI GUYNUP,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	NO. 2:06-CV-04315
	:	
LANCASTER COUNTY, et al.,	:	
	:	
Defendants.	:	JURY TRIAL DEMANDED

Verdict Form

We, the jury, unanimously find the following by a preponderance of the evidence:

(1) Did defendant Steberger intentionally commit an act that violated Traci Guynup's Fourteenth Amendment right not to be subjected to excessive force?

Answer: Yes_____ No_____

IF YOU ANSWERED "YES" TO PART 1, PROCEED TO PART 2, OTHERWISE, PLEASE SKIP TO QUESTION 5.

(2) Did defendant Steberger's act, described in Part (1) above, cause injury to [plaintiff]?

Answer: Yes_____ No_____

IF YOU ANSWERED “YES” TO PART 2, PROCEED TO PART (3)(A), AND SKIP PART (3)(B).

IF YOU ANSWERED “NO” TO PART 2, SKIP PART 3(A) AND PROCEED TO PART 3(B).

(3)(A) Please state the amount that will fairly compensate Traci Guynup for any injury she actually sustained as a result of defendant’s conduct.

Answer: \$_____
(Fill in dollar figure)

(3)(B) Because we answered “No” to Part 2, Traci Guynup is awarded nominal damages in the amount of \$1.00.

AFTER ANSWERING PART 3, PROCEED TO PART 4.

(4)(A) Did defendant Steberger act maliciously or wantonly in violating Traci Guynup’s rights?

Answer: Yes___ No___

IF YOU ANSWERED “YES” TO PART 4(A), PROCEED TO PART 4(B). OTHERWISE PLEASE SKIP TO QUESTION 5.

4(B) Do you award punitive damages against defendant Steberger?

Answer: Yes___ No___

If yes, in what amount?

Answer: \$_____
(Fill in Dollar Figure)

(5) Did defendants intentionally commit an act that violated Traci Guynup's Fourteenth Amendment right not to be subjected to inhumane prison conditions?

Answer: Yes_____ No_____

IF YOU ANSWERED "YES" TO PART 5, PROCEED TO PART 6, OTHERWISE, PLEASE SKIP TO QUESTION 8.

(6) Did defendants' acts, described in Part (5) above, cause injury to [plaintiff]?

Answer: Yes_____ No_____

IF YOU ANSWERED "YES" TO PART 5, PROCEED TO PART (6)(A), AND SKIP PART (6)(B).

IF YOU ANSWERED "NO" TO PART 5, SKIP PART 6(A) AND PROCEED TO PART 6(B).

(6)(A) Please state the amount that will fairly compensate Traci Guynup for any injury she actually sustained as a result of defendants' conduct.

Answer: \$_____
(Fill in dollar figure)

(6)(B) Because we answered "No" to Part 2, Traci Guynup is awarded nominal damages in the amount of \$1.00.

AFTER ANSWERING PART 6, PROCEED TO PART 7.

(7)(A) Did defendants act maliciously or wantonly in violating Traci Guynup's rights?

Answer: Yes___ No___

IF YOU ANSWERED “YES” TO PART 7(A), PROCEED TO PART 7(B). OTHERWISE PLEASE STOP.

7(B) Do you award punitive damages against defendants?

Answer: Yes___ No___

If yes, in what amount?

Answer: \$_____
(Fill in Dollar Figure)

(8) Did defendants Sumesco [sic], McWilliams and Moyer intentionally commit an act(s) that violated Traci Guynup’s Fourteenth Amendment right to adequate psychiatric care?

Answer: Yes___ No___

IF YOU ANSWERED “YES” TO PART 8, PROCEED TO PART 9, OTHERWISE, PLEASE SKIP TO QUESTION 12.

(9) Did defendants’ act(s), described in Part (8) above, cause injury to [plaintiff]?

Answer: Yes___ No___

IF YOU ANSWERED “YES” TO PART 9, PROCEED TO PART (10)(A), AND SKIP PART (10)(B).

IF YOU ANSWERED “NO” TO PART 9, SKIP PART 10(A) AND PROCEED TO PART 10(B).

(10)(A) Please state the amount that will fairly compensate Traci Guynup for any injury she actually sustained as a result of defendants' conduct.

Answer: \$_____
(Fill in dollar figure)

(10)(B) Because we answered "No" to Part 9, Traci Guynup is awarded nominal damages in the amount of \$1.00.

AFTER ANSWERING PART 10, PROCEED TO PART 11.

(11)(A) Did defendants Sumesco [sic], McWilliams and Moyer act maliciously or wantonly in violating Traci Guynup's rights?

Answer: Yes___ No___

IF YOU ANSWERED "YES" TO PART 11(A), PROCEED TO PART 11(B). OTHERWISE PLEASE SKIP TO QUESTION 12.

11(B) Do you award punitive damages against defendants?

Answer: Yes___No___

If yes, in what amount?

Answer: \$_____
(Fill in Dollar Figure)

(12) Did defendants intentionally commit an act(s) that violated Traci Guynup's First Amendment right to seek redress of her grievances in a manner free from retaliation?

Answer: Yes___ No___

IF YOU ANSWERED "YES" TO PART 12, PROCEED TO PART 13, OTHERWISE, PLEASE STOP.

(13) Did defendants' act(s), described in Part (8) above, cause injury to [plaintiff]?

Answer: Yes_____ No_____

IF YOU ANSWERED "YES" TO PART 13, PROCEED TO PART (14)(A), AND SKIP PART (14)(B).

IF YOU ANSWERED "NO" TO PART 13, SKIP PART 14(A) AND PROCEED TO PART 14(B).

(14)(A) Please state the amount that will fairly compensate Traci Guynup for any injury she actually sustained as a result of defendants' conduct.

Answer: \$_____
(Fill in dollar figure)

(14)(B) Because we answered "No" to Part 9, Traci Guynup is awarded nominal damages in the amount of \$1.00.

AFTER ANSWERING PART 14, PROCEED TO PART 15.

15(A) Did defendants act maliciously or wantonly in violating Traci Guynup's right to be free from retaliation?

Answer: Yes_____ No_____

IF YOU ANSWERED "YES" TO PART 15(A), PROCEED TO PART 15(B). OTHERWISE PLEASE SKIP TO QUESTION 16.

15(B) Do you award punitive damages against defendants?

Answer: Yes_____ No_____

If yes, in what amount?

Answer: \$_____
(Fill in Dollar Figure)

(16) Did defendant County intentionally violate Traci Guynup's rights under the Americans with Disabilities Act?

Answer: Yes_____ No_____

IF YOU ANSWERED "YES" TO PART 16, PROCEED TO PART 17, OTHERWISE, PLEASE SKIP TO QUESTION 19.

(17) Did defendant County's conduct, described in Part (16) above, cause harm to [plaintiff]?

Answer: Yes_____ No_____

IF YOU ANSWERED "YES" TO PART 17, PROCEED TO PART (18)(A), AND SKIP PART (18)(B).

IF YOU ANSWERED "NO" TO PART 17, SKIP PART 18(A) AND PROCEED TO PART 18(B).

(18)(A) Please state the amount that will fairly compensate Traci Guynup for any injury she actually sustained as a result of defendant County's conduct.

Answer: \$_____
(Fill in dollar figure)

(18)(B) Because we answered "No" to Part 9, Traci Guynup is awarded nominal damages in the amount of \$1.00.

AFTER ANSWERING PART 18, PROCEED TO PART 19.

(19) Did defendant Steberger commit an act of assault and battery on Traci Guynup?

Answer: Yes_____ No_____

IF YOU ANSWERED “YES” TO PART 19, PROCEED TO PART 20, OTHERWISE, PLEASE STOP.

(20) Did defendant Steberger’s act, described in Part (19) above, cause injury to [plaintiff]?

Answer: Yes_____ No_____

IF YOU ANSWERED “YES” TO PART 19, PROCEED TO PART (20)(A), AND SKIP PART (20)(B).

IF YOU ANSWERED “NO” TO PART 19, SKIP PART 20(A) AND PROCEED TO PART 20(B).

(20)(A) Please state the amount that will fairly compensate Traci Guynup for any injury she actually sustained as a result of defendant’s conduct.

Answer: \$_____
(Fill in dollar figure)

(20)(B) Because we answered “No” to Part 19, Traci Guynup is awarded nominal damages in the amount of \$1.00.

AFTER ANSWERING PART 20, PROCEED TO PART 21.

21(A) Did defendant act maliciously or wantonly in violating Traci Guynup’s rights?

Answer: Yes_____ No_____

IF YOU ANSWERED “YES” TO PART 21(A), PROCEED TO PART 22(B). OTHERWISE PLEASE STOP.

22(B) Do you award punitive damages against defendant?

Answer: Yes___ No___

If yes, in what amount?

Answer: \$_____
(Fill in Dollar Figure)

SO SAY WE ALL, this___day of_____,2008.

Foreperson